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June 20, 2019

Via ECF  
Magistrate Judge Steven C. Mannion  
United States District Court - NJ  
Martin Luther King, Jr. Federal Courthouse  
50 Walnut Street.  
Newark, NJ 07102

*Re: United States, ex rel. Armstrong v. Andover, et al.,  
Civil Action No. (12-3319 SDW)  
Joint Update to Status Conference on June 21, 2019 at 11:30A.M. (new time)*

Dear Judge Mannion:

Please accept this as the parties' update to the joint status letter Document 87.

- 1) The discovery motion at Document 78 is withdrawn.
- 2) The discovery motion at Document 79 remains at issue for the reasons set forth in the motion. Relator contends that the motion would be moot if the Defendants would stipulate that the claims data received from the State of New Jersey and U.S. Health and Human Services ("CMS") are true and accurate. Defendants contend that it cannot stipulate to same and leaves the Relator to its proofs.
- 3) As to the items A through F set forth in the joint status letter Document 87:
  - a. Items A and B are no longer at issue; and,
  - b. Items C through F remain as issues to be discussed.

Respectfully submitted,

Dated: June 20, 2019

/s Bradford L. Geyer  
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